

From: **Jack Cohn** <jcohn@grsm.com>

Date: Wed, May 16, 2018 at 5:16 PM

Subject: RE: Campbell v. PSBA -- Confidential Settlement Communication

To: "mbonner@medurebonnerlaw.com" <mbonner@medurebonnerlaw.com>, "Brian Boland" <bboland@kozloffstoudt.com>" <bboland@kozloffstoudt.com>, "jef@kingspry.com" <jef@kingspry.com>, "pfanelli@fanwil.com" <pfanelli@fanwil.com>, "gparker@haverfordsd.net" <gparker@haverfordsd.net>, "asalawchris@atlanticbb.net" <asalawchris@atlanticbb.net>, "jgornall@kmgslaw.com" <jgornall@kmgslaw.com>, "tandrews@andrewsandprice.com" <tandrews@andrewsandprice.com>, "mwiley@mcclaw.com" <mwiley@mcclaw.com>, "setter@etterlawfirm.com" <setter@etterlawfirm.com>, "mking@stockandleader.com" <mking@stockandleader.com>, "mcassidy@johnsonduffie.com" <mcassidy@johnsonduffie.com>

Dear Solicitors,

It didn't take very long for one or more of you (or the people that you forwarded it to) to forward my below email to PSBA – presumably with the assent of the respective school district and its insurers. So much for my trying to be polite and send you a confidential settlement communication. If any of you, or your district's insurers, actually want to have a productive, confidential settlement dialogue, please feel free to reach out to me separately to affirm an undertaking of confidentiality.

In the meantime, the forwarders created documents that are responsive to Plaintiffs' outstanding discovery requests to the existing Defendants that must be identified and produced to us pursuant to Defendants discovery obligations under the Federal Rules. Please let the sender(s) and their district's insurers know that their districts will not be looked upon favorably in settlement discussions as a result of this breach of "etiquette."

Sincerely,

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